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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE:

DEC 10 1991

SUBJECT: Review of the Final Draft Baseline Risk Assessment for
the ACS NPL Site, Griffith, IN

FROM: Pat Van Leeuwen, Toxicologist
Technical Support Unit

TO: Wade Hartwick
Remedial Project Manager

I have examined the revised Final Risk Assessment for the ACS NPL site, dated September 1991. My review was limited to EPA Comments numbered 1-9 in the response letter from Peter Vagt, Warzyn Inc., dated September 25, 1991, as these comments referred to my review comments of August 1, 1991 submitted to Bob Swale. I do not have a copy of the twelve additional comments submitted to Warzyn Inc. on August 19, 1991, so was unable to judge if these concerns had been addressed. Most of the nine comments I submitted to Bob Swale have been addressed; two were not addressed and the document reflects no change in these areas. The response to EPA Comments numbered 1-9 are summarized below.

EPA Comment Number:

1. Comment addressed.
2. Comment addressed.
3. Comment addressed.
4. Comment addressed.

5. Comment: Tables 7-2 through 7-10 The number of significant digits reported in media samples is okay, but I still question the use of so many significant digits in the mean concentration value - i.e., on page 1, total xylenes: is a mean concentration of 240252.67 ug/kg appropriate given measurements with two significant digits?

The number of significant digits reflected in calculations made by Warzyn Inc. for mean concentration values remains unchanged. While this is an error we can live with, perhaps Warzyn should have included a footnote in the indicated

Tables, explaining that the accuracy reflected in these values is calculated, not actual. We cannot generate accuracy in the computer!

6. Comment addressed.

7. Comment: Table T-7 Why was the IR changed to 200 mg/day if the trespasser child age is assumed to be 5-15 years? The 200 mg/kg rate is currently applied to children aged 1-6 and 100 mg/kg is used for older children and adults. An integrated IR ($1 \times 200 + 9 \times 100$ mg/kg) would be most correct. I don't know where this change came from.

Warzyn's response letter indicates that this comment was corrected and refers to page 3 of the hand-written corrections. The hand-written response on page 3 to comment 7 refers to corrections to Table T-6, and states that changes in calculated risk or text was not affected. An examination of Appendix T, shows that Table T-7 was not corrected and still retains the incorrect ingestion rate for children ages 5-15 years of age. A change in this Table would necessitate a change in other tables and text in the document. This error results in a more conservative calculation, so perhaps we can live with it. It is not defensible in court, should the PRPs object to the calculation methods.

8. Comment addressed.

9. Comment addressed.

If you have further questions regarding this review or any other questions on risk assessment methodology, please feel free to call me at (312) 886-4904.

I have enclosed a Critique Sheet to allow TSU to evaluate their services. Please complete it and return it to Steve Ostrodka at your earliest convenience.